

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**THE DRA PARTIES' CONFIRMATION HEARING
WITNESS LIST, EXHIBIT LIST AND DEPOSITION DESIGNATIONS**

To the Honorable United States District Court Judge Laura Taylor Swain:

AmeriNational Community Services, LLC (the “Servicer”), as servicer for the GDB Debt Recovery Authority (the “DRA”), and Cantor-Katz Collateral Monitor LLC, a Delaware limited liability company (the “Collateral Monitor” and, together with the Servicer, collectively, the “DRA Parties”), which serves as the collateral monitor for Wilmington Trust, N.A. in connection with bonds the DRA issued, respectfully submit their Finalized Witness List, Exhibit List and Deposition Designations for the Confirmation Hearing in accordance with paragraphs 3 and 4 of the *Amended Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith*, Dkt. No. 18394 (“Amended Confirmation

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

Procedures Order") and paragraph 5 of the *Order Regarding Procedures for Hearing on Confirmation of Plan of Adjustment*, Dkt. No. 18502 ("**Trial Procedures Order**," and together with the Amended Confirmation Procedures Order, the "**Orders**").²

1. Pursuant to the Orders, the DRA Parties submit this filing subject to the objections and reservations contained herein.

2. This case is "the largest proceeding to restructure debt in the history of the American municipal bond market." *Assured Guar. Corp. v. Fin. Oversight & Mgmt. Bd. for P.R.* (*In re Fin. Oversight & Mgmt. Bd. for P.R.*), 872 F.3d 57, 64 (1st Cir. 2017). It was commenced nearly four and a half years ago, on May 9, 2017. Dkt. No. 1. Discovery with respect to Plan confirmation began 77 days ago and required (subject only to exceptions provided by the Court) discovery to be completed in 49 business days. *See* Amended Confirmation Procedures Order ¶ 3. The DRA Parties objected and reserved all rights regarding the Amended Confirmation Procedures Order because it is unfair and limits their due process rights. The DRA Parties continue to maintain their objections and reservations.

3. It is impossible to submit comprehensive lists and designations at this time. The FOMB has not yet submitted a single declaration for any of the witnesses it intends to proffer as part of its case-in-chief because such declarations are not due until Monday. *See id.* For the same reasons, it is unfair to require the DRA Parties to submit deposition designations before the FOMB, as the Plan proponent, has filed the declarations it will rely upon in this case. Furthermore, parties-in-interest including the FOMB may identify additional affirmative witnesses today. *See id.* The Orders do not provide the DRA Parties a way to address these new witnesses at trial. *See id.* ¶ 4; Trial Procedures Order ¶ 5.

² Unless otherwise indicated, all docket references herein refer to the docket of Case No. 17-BK-3283 (LTS).

4. Additionally, the Orders limit direct testimony to declaration. Amended Confirmation Procedures Order ¶¶ 3, 21; Trial Procedures Order ¶ 5. This may prevent the DRA Parties from proffering direct testimony for witnesses it does not control, including for matters as simple as the authentication of documents, which the FOMB and AAFAF, among other parties, have unreasonably refused to authenticate.³

5. Further, the DRA Parties are submitting these lists and designations simultaneously with all other parties-in-interest. *See* Amended Confirmation Procedures Order ¶ 3. The DRA Parties have included all of the witnesses and exhibits that they believe they may examine, introduce, or rely upon during their case at trial without the benefit of any of these indications of how other parties-in-interest will approach trial. Similarly, on October 27 by 1:00pm A.S.T., the DRA Parties will submit their pre-trial informative motion simultaneously with all other parties-in-interest, and without the benefit of having received copies of other parties' exhibits or an adequate opportunity to examine the declarations multiple parties are expected to file before midnight on October 25. *Id.*; Trial Procedures Order ¶ 4(a).

6. These simultaneous submissions unfairly prejudice the DRA Parties because the DRA Parties have had no opportunity to take into account these simultaneous submissions in selecting witnesses, exhibits, and deposition designations, and because demonstrating that the Plan satisfies each and every element required for confirmation under PROMESA § 314(b) is the FOMB's affirmative burden in this case to prove, and not the DRA Parties' burden to disprove. 48 U.S.C. § 2174(b).

7. Further, the DRA Parties do not know whether the Court may hear any issues that impact the DRA Parties that also go beyond the issues raised in the *Objection of the DRA Parties*

³ Counsel for the FOMB has stated that the DRA Parties may not call affirmative witnesses unless the DRA Parties have a declaration for that witness, even where the DRA Parties do not control the witness.

to the Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico,
Dkt. No. 18590.

8. In this circumstance, the DRA Parties may need additional or different witnesses or exhibits than those listed in this submission in order to be heard on its rights and provide an adequate record to the Court. The DRA Parties expressly reserve their right to identify additional witnesses and exhibits based on any developments or unanticipated issues that may arise before and/or during the confirmation hearing. The DRA Parties reserve the right to supplement the witness and exhibit lists after consideration of the witness and exhibit lists filed by the other parties in this proceeding. Moreover, the DRA Parties reserve the right to present some, and not necessarily all, of the witnesses and exhibits included in these lists.

Witness List

Subject to the objections and reservations herein, the DRA Parties may call as witnesses during the Confirmation Hearing, for direct or cross examination, the following individuals:⁴

1. Douglas J. Brickley – Expert witness for direct and possible re-direct testimony regarding the clawback the Commonwealth conducted in purported reliance on article VI section 8 of the Puerto Rico Constitution.

2. Lizette Martínez – Expert witness for direct and possible re-direct testimony regarding the flow of funds from the Commonwealth to HTA.

3. David W. Prager – Expert witness for direct and possible re-direct testimony regarding whether the Plan is in the best interests of creditors.

4. Stephen Spencer, Managing Director at Houlihan Lokey, 245 Park Avenue, 20th Floor, New York, NY 10167 – Fact witness for direct, possible re-direct, or possible rebuttal

⁴ The descriptions provided herein are illustrative only and the DRA Parties reserve the right to present a different, modified, reduced, or expanded scope of testimony at trial.

testimony regarding the quantum and nature of (1) the DRA's prepetition Claim on account of the GDB-HTA Loans and (2) the CW/HTA Claim in Sections 2.2(a), 63.1, and 63.2, and any other relevant section of the Plan.

5. Individual(s) to authenticate documents, to the extent that adequate authentication of such documents is not accomplished through the Requests for Admission process, may be called on for direct, cross, possible re-direct, or possible rebuttal examination to authenticate such documents.

6. The DRA Parties reserve the right to call or cross-examine any witness on any other party's preliminary, amended, or final witness list,⁵ ***including but not limited to the following***, for cross-examination relevant to the DRA Parties' case at trial:

- a. Timothy Ahlberg
- b. Fernando Batlle
- c. David Brownstein
- d. Adam Chepenik
- e. Jorge A. Clivilles-Diaz
- f. Jay Herriman
- g. Natalie Jaresko
- h. Sheva R. Levy
- i. Gaurav Malhotra
- j. Marti P. Murray
- k. Christina Pullo

⁵ By listing an individual here, the DRA Parties do not accept that any such individual is qualified to testify in any respect or that any party has the right to call such witness at trial; and hereby reserve all rights to object to any such testimony.

l. Juan Santambrogio

m. Ojas N. Shah

n. David A. Skeel, Jr.

o. Cecile Tirado

p. Andrew Wolfe

q. Steve Zelin

7. Consistent with Amended Confirmation Procedures Order ¶ 4, the same or additional witnesses as those listed herein “to rebut testimony offered or adduced at the Confirmation Hearing.”

8. The DRA Parties also reserve the right to not call any of the above-listed potential witnesses. By identifying the above-listed potential witnesses, the DRA Parties are in no way waiving any rights to challenge any witness on any grounds, including admissibility. Moreover, consistent with all the objections and reservations herein, no listing herein is meant to be comprehensive or to limit who the DRA Parties may call or examine as witnesses, or the subject matters of such testimony.

Exhibit List

The DRA Parties may use the following exhibits at the Plan confirmation hearing, subject to the objections and reservations herein:

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 1	Treasury Single Account Cash Flow weekly report dated October 20, 2017
DRA Ex. 2	Treasury Single Account Cash Flow weekly report dated October 27, 2017
DRA Ex. 3	Treasury Single Account Cash Flow weekly report dated November 3, 2017

⁶ The descriptions provided herein are for reference only and are not meant to be comprehensive.

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 4	Treasury Single Account Cash Flow weekly report dated November 10, 2017
DRA Ex. 5	Treasury Single Account Cash Flow weekly report dated November 17, 2017
DRA Ex. 6	Treasury Single Account Cash Flow weekly report dated November 24, 2017
DRA Ex. 7	Treasury Single Account Cash Flow weekly report dated December 1, 2017
DRA Ex. 8	Treasury Single Account Cash Flow weekly report dated December 8, 2017
DRA Ex. 9	Treasury Single Account Cash Flow weekly report dated December 15, 2017
DRA Ex. 10	Treasury Single Account Cash Flow weekly report dated December 22, 2017
DRA Ex. 11	Treasury Single Account Cash Flow weekly report dated December 29, 2017
DRA Ex. 12	Treasury Single Account Cash Flow weekly report dated January 5, 2018
DRA Ex. 13	Treasury Single Account Cash Flow weekly report dated January 12, 2018
DRA Ex. 14	Treasury Single Account Cash Flow weekly report dated January 19, 2018
DRA Ex. 15	Treasury Single Account Cash Flow weekly report dated January 26, 2018
DRA Ex. 16	Treasury Single Account Cash Flow weekly report dated February 2, 2018
DRA Ex. 17	Treasury Single Account Cash Flow weekly report dated February 9, 2018
DRA Ex. 18	Treasury Single Account Cash Flow weekly report dated February 16, 2018
DRA Ex. 19	Treasury Single Account Cash Flow weekly report dated February 23, 2018
DRA Ex. 20	Treasury Single Account Cash Flow weekly report dated March 2, 2018
DRA Ex. 21	Treasury Single Account Cash Flow weekly report dated March 9, 2018
DRA Ex. 22	Treasury Single Account Cash Flow weekly report dated March 16, 2018
DRA Ex. 23	Treasury Single Account Cash Flow weekly report dated March 23, 2018
DRA Ex. 24	Treasury Single Account Cash Flow weekly report dated March 30, 2018
DRA Ex. 25	Treasury Single Account Cash Flow weekly report dated April 6, 2018
DRA Ex. 26	Treasury Single Account Cash Flow weekly report dated April 13, 2018

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 27	Treasury Single Account Cash Flow weekly report dated April 20, 2018
DRA Ex. 28	Treasury Single Account Cash Flow weekly report dated April 27, 2018
DRA Ex. 29	Treasury Single Account Cash Flow weekly report dated May 4, 2018
DRA Ex. 30	Treasury Single Account Cash Flow weekly report dated May 11, 2018
DRA Ex. 31	Treasury Single Account Cash Flow weekly report dated May 18, 2018
DRA Ex. 32	Treasury Single Account Cash Flow weekly report dated May 25, 2018
DRA Ex. 33	Treasury Single Account Cash Flow weekly report dated June 1, 2018
DRA Ex. 34	Treasury Single Account Cash Flow weekly report dated June 8, 2018
DRA Ex. 35	Treasury Single Account Cash Flow weekly report dated June 15, 2018
DRA Ex. 36	Treasury Single Account Cash Flow weekly report dated June 22, 2018
DRA Ex. 37	Treasury Single Account Cash Flow weekly report dated June 29, 2018
DRA Ex. 38	Treasury Single Account Cash Flow weekly report dated July 6, 2018
DRA Ex. 39	Treasury Single Account Cash Flow weekly report dated July 13, 2018
DRA Ex. 40	Treasury Single Account Cash Flow weekly report dated July 20, 2018
DRA Ex. 41	Treasury Single Account Cash Flow weekly report dated July 27, 2018
DRA Ex. 42	Treasury Single Account Cash Flow weekly report dated August 3, 2018
DRA Ex. 43	Treasury Single Account Cash Flow weekly report dated August 10, 2018
DRA Ex. 44	Treasury Single Account Cash Flow weekly report dated August 17, 2018
DRA Ex. 45	Treasury Single Account Cash Flow weekly report dated August 24, 2018
DRA Ex. 46	Treasury Single Account Cash Flow weekly report dated August 31, 2018
DRA Ex. 47	Treasury Single Account Cash Flow weekly report dated September 7, 2018
DRA Ex. 48	Treasury Single Account Cash Flow weekly report dated September 14, 2018
DRA Ex. 49	Treasury Single Account Cash Flow weekly report dated September 21, 2018
DRA Ex. 50	Treasury Single Account Cash Flow weekly report dated September 28, 2018

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 51	Treasury Single Account Cash Flow weekly report dated October 5, 2018
DRA Ex. 52	Treasury Single Account Cash Flow weekly report dated October 12, 2018
DRA Ex. 53	Treasury Single Account Cash Flow weekly report dated October 19, 2018
DRA Ex. 54	Treasury Single Account Cash Flow weekly report dated October 26, 2018
DRA Ex. 55	Treasury Single Account Cash Flow weekly report dated November 2, 2018
DRA Ex. 56	Treasury Single Account Cash Flow weekly report dated November 9, 2018
DRA Ex. 57	Treasury Single Account Cash Flow weekly report dated November 16, 2018
DRA Ex. 58	Treasury Single Account Cash Flow weekly report dated November 23, 2018
DRA Ex. 59	Treasury Single Account Cash Flow weekly report dated November 30, 2018
DRA Ex. 60	Treasury Single Account Cash Flow weekly report dated December 7, 2018
DRA Ex. 61	Treasury Single Account Cash Flow weekly report dated December 14, 2018
DRA Ex. 62	Treasury Single Account Cash Flow weekly report dated December 21, 2018
DRA Ex. 63	Treasury Single Account Cash Flow weekly report dated December 28, 2018
DRA Ex. 64	Treasury Single Account Cash Flow weekly report dated January 4, 2019
DRA Ex. 65	Treasury Single Account Cash Flow weekly report dated January 11, 2019
DRA Ex. 66	Treasury Single Account Cash Flow weekly report dated January 18, 2019
DRA Ex. 67	Treasury Single Account Cash Flow weekly report dated January 25, 2019
DRA Ex. 68	Treasury Single Account Cash Flow weekly report dated February 1, 2019
DRA Ex. 69	Treasury Single Account Cash Flow weekly report dated February 8, 2019
DRA Ex. 70	Treasury Single Account Cash Flow weekly report dated February 15, 2019
DRA Ex. 71	Treasury Single Account Cash Flow weekly report dated February 22, 2019
DRA Ex. 72	Treasury Single Account Cash Flow weekly report dated March 1, 2019

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 73	Treasury Single Account Cash Flow weekly report dated March 8, 2019
DRA Ex. 74	Treasury Single Account Cash Flow weekly report dated March 15, 2019
DRA Ex. 75	Treasury Single Account Cash Flow weekly report dated March 22, 2019
DRA Ex. 76	Treasury Single Account Cash Flow weekly report dated March 29, 2019
DRA Ex. 77	Treasury Single Account Cash Flow weekly report dated April 5, 2019
DRA Ex. 78	Treasury Single Account Cash Flow weekly report dated April 12, 2019
DRA Ex. 79	Treasury Single Account Cash Flow weekly report dated April 19, 2019
DRA Ex. 80	Treasury Single Account Cash Flow weekly report dated April 26, 2019
DRA Ex. 81	Treasury Single Account Cash Flow weekly report dated May 3, 2019
DRA Ex. 82	Treasury Single Account Cash Flow weekly report dated May 10, 2019
DRA Ex. 83	Treasury Single Account Cash Flow weekly report dated May 17, 2019
DRA Ex. 84	Treasury Single Account Cash Flow weekly report dated May 24, 2019
DRA Ex. 85	Treasury Single Account Cash Flow weekly report dated May 31, 2019
DRA Ex. 86	Treasury Single Account Cash Flow weekly report dated June 7, 2019
DRA Ex. 87	Treasury Single Account Cash Flow weekly report dated June 14, 2019
DRA Ex. 88	Treasury Single Account Cash Flow weekly report dated June 21, 2019
DRA Ex. 89	Treasury Single Account Cash Flow weekly report dated June 28, 2019
DRA Ex. 90	Treasury Single Account Cash Flow weekly report dated July 5, 2019
DRA Ex. 91	Treasury Single Account Cash Flow weekly report dated July 12, 2019
DRA Ex. 92	Treasury Single Account Cash Flow weekly report dated July 19, 2019
DRA Ex. 93	Treasury Single Account Cash Flow weekly report dated July 26, 2019
DRA Ex. 94	Treasury Single Account Cash Flow weekly report dated August 2, 2019
DRA Ex. 95	Treasury Single Account Cash Flow weekly report dated August 9, 2019
DRA Ex. 96	Treasury Single Account Cash Flow weekly report dated August 16, 2019

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 97	Treasury Single Account Cash Flow weekly report dated August 23, 2019
DRA Ex. 98	Treasury Single Account Cash Flow weekly report dated August 30, 2019
DRA Ex. 99	Treasury Single Account Cash Flow weekly report dated September 6, 2019
DRA Ex. 100	Treasury Single Account Cash Flow weekly report dated September 13, 2019
DRA Ex. 101	Treasury Single Account Cash Flow weekly report dated September 20, 2019
DRA Ex. 102	Treasury Single Account Cash Flow weekly report dated September 27, 2019
DRA Ex. 103	Treasury Single Account Cash Flow weekly report dated October 4, 2019
DRA Ex. 104	Treasury Single Account Cash Flow weekly report dated October 11, 2019
DRA Ex. 105	Treasury Single Account Cash Flow weekly report dated October 18, 2019
DRA Ex. 106	Treasury Single Account Cash Flow weekly report dated October 25, 2019
DRA Ex. 107	Treasury Single Account Cash Flow weekly report dated November 1, 2019
DRA Ex. 108	Treasury Single Account Cash Flow weekly report dated November 8, 2019
DRA Ex. 109	Treasury Single Account Cash Flow weekly report dated November 15, 2019
DRA Ex. 110	Treasury Single Account Cash Flow weekly report dated November 22, 2019
DRA Ex. 111	Treasury Single Account Cash Flow weekly report dated November 29, 2019
DRA Ex. 112	Treasury Single Account Cash Flow weekly report dated December 6, 2019
DRA Ex. 113	Treasury Single Account Cash Flow weekly report dated December 13, 2019
DRA Ex. 114	Treasury Single Account Cash Flow weekly report dated December 20, 2019
DRA Ex. 115	Treasury Single Account Cash Flow weekly report dated December 27, 2019
DRA Ex. 116	Treasury Single Account Cash Flow weekly report dated January 3, 2020
DRA Ex. 117	Treasury Single Account Cash Flow weekly report dated January 10, 2020
DRA Ex. 118	Treasury Single Account Cash Flow weekly report dated January 17, 2020

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 119	Treasury Single Account Cash Flow weekly report dated January 24, 2020
DRA Ex. 120	Treasury Single Account Cash Flow weekly report dated January 31, 2020
DRA Ex. 121	Treasury Single Account Cash Flow weekly report dated February 7, 2020
DRA Ex. 122	Treasury Single Account Cash Flow weekly report dated February 14, 2020
DRA Ex. 123	Treasury Single Account Cash Flow weekly report dated February 21, 2020
DRA Ex. 124	Treasury Single Account Cash Flow weekly report dated February 28, 2020
DRA Ex. 125	Treasury Single Account Cash Flow weekly report dated March 6, 2020
DRA Ex. 126	Treasury Single Account Cash Flow weekly report dated March 13 2020
DRA Ex. 127	Treasury Single Account Cash Flow weekly report dated March 20, 2020
DRA Ex. 128	Treasury Single Account Cash Flow weekly report dated March 27, 2020
DRA Ex. 129	Treasury Single Account Cash Flow weekly report dated April 3, 2020
DRA Ex. 130	Treasury Single Account Cash Flow weekly report dated April 10, 2020
DRA Ex. 131	Treasury Single Account Cash Flow weekly report dated April 17, 2020
DRA Ex. 132	Treasury Single Account Cash Flow weekly report dated April 24, 2020
DRA Ex. 133	Treasury Single Account Cash Flow weekly report dated May 1, 2020
DRA Ex. 134	Treasury Single Account Cash Flow weekly report dated May 8, 2020
DRA Ex. 135	Treasury Single Account Cash Flow weekly report dated May 15, 2020
DRA Ex. 136	Treasury Single Account Cash Flow weekly report dated May 22, 2020
DRA Ex. 137	Treasury Single Account Cash Flow weekly report dated May 29, 2020
DRA Ex. 138	Treasury Single Account Cash Flow weekly report dated June 5, 2020
DRA Ex. 139	Treasury Single Account Cash Flow weekly report dated June 12, 2020
DRA Ex. 140	Treasury Single Account Cash Flow weekly report dated June 19, 2020
DRA Ex. 141	Treasury Single Account Cash Flow weekly report dated June 26, 2020
DRA Ex. 142	Treasury Single Account Cash Flow weekly report dated July 3, 2020

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 143	Treasury Single Account Cash Flow weekly report dated July 10, 2020
DRA Ex. 144	Treasury Single Account Cash Flow weekly report dated July 17, 2020
DRA Ex. 145	Treasury Single Account Cash Flow weekly report dated July 24, 2020
DRA Ex. 146	Treasury Single Account Cash Flow weekly report dated July 31, 2020
DRA Ex. 147	Treasury Single Account Cash Flow weekly report dated August 7, 2020
DRA Ex. 148	Treasury Single Account Cash Flow weekly report dated August 14, 2020
DRA Ex. 149	Treasury Single Account Cash Flow weekly report dated August 21, 2020
DRA Ex. 150	Treasury Single Account Cash Flow weekly report dated August 28, 2020
DRA Ex. 151	Treasury Single Account Cash Flow weekly report dated September 4, 2020
DRA Ex. 152	Treasury Single Account Cash Flow weekly report dated September 11, 2020
DRA Ex. 153	Treasury Single Account Cash Flow weekly report dated September 18, 2020
DRA Ex. 154	Treasury Single Account Cash Flow weekly report dated September 25, 2020
DRA Ex. 155	Treasury Single Account Cash Flow weekly report dated October 2, 2020
DRA Ex. 156	Treasury Single Account Cash Flow weekly report dated October 9, 2020
DRA Ex. 157	Treasury Single Account Cash Flow weekly report dated October 16, 2020
DRA Ex. 158	Treasury Single Account Cash Flow weekly report dated October 23, 2020
DRA Ex. 159	Treasury Single Account Cash Flow weekly report dated October 30, 2020
DRA Ex. 160	Treasury Single Account Cash Flow weekly report dated November 6, 2020
DRA Ex. 161	Treasury Single Account Cash Flow weekly report dated November 13, 2020
DRA Ex. 162	Treasury Single Account Cash Flow weekly report dated November 20, 2020
DRA Ex. 163	Treasury Single Account Cash Flow weekly report dated November 27, 2020
DRA Ex. 164	Treasury Single Account Cash Flow weekly report dated December 4, 2020

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 165	Treasury Single Account Cash Flow weekly report dated December 11, 2020
DRA Ex. 166	Treasury Single Account Cash Flow weekly report dated December 18, 2020
DRA Ex. 167	Treasury Single Account Cash Flow weekly report dated December 25, 2020
DRA Ex. 168	Treasury Single Account Cash Flow weekly report dated January 1, 2021
DRA Ex. 169	Treasury Single Account Cash Flow weekly report dated January 8, 2021
DRA Ex. 170	Treasury Single Account Cash Flow weekly report dated January 15, 2021
DRA Ex. 171	Treasury Single Account Cash Flow weekly report dated January 22, 2021
DRA Ex. 172	Treasury Single Account Cash Flow weekly report dated January 29, 2021
DRA Ex. 173	Treasury Single Account Cash Flow weekly report dated February 5, 2021
DRA Ex. 174	Treasury Single Account Cash Flow weekly report dated February 12, 2021
DRA Ex. 175	Treasury Single Account Cash Flow weekly report dated February 19, 2021
DRA Ex. 176	Treasury Single Account Cash Flow weekly report dated February 26, 2021
DRA Ex. 177	Treasury Single Account Cash Flow weekly report dated March 5, 2021
DRA Ex. 178	Treasury Single Account Cash Flow weekly report dated March 12, 2021
DRA Ex. 179	Treasury Single Account Cash Flow weekly report dated March 19, 2021
DRA Ex. 180	Treasury Single Account Cash Flow weekly report dated March 26, 2021
DRA Ex. 181	Treasury Single Account Cash Flow weekly report dated April 2, 2021
DRA Ex. 182	Treasury Single Account Cash Flow weekly report dated April 9, 2021
DRA Ex. 183	Treasury Single Account Cash Flow weekly report dated April 16, 2021
DRA Ex. 184	Treasury Single Account Cash Flow weekly report dated April 23, 2021
DRA Ex. 185	Treasury Single Account Cash Flow weekly report dated April 30, 2021
DRA Ex. 186	Treasury Single Account Cash Flow weekly report dated May 7, 2021
DRA Ex. 187	Treasury Single Account Cash Flow weekly report dated May 14, 2021

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 188	Treasury Single Account Cash Flow weekly report dated May 21, 2021
DRA Ex. 189	Treasury Single Account Cash Flow weekly report dated May 28, 2021
DRA Ex. 190	Treasury Single Account Cash Flow weekly report dated June 4, 2021
DRA Ex. 191	Treasury Single Account Cash Flow weekly report dated June 11, 2021
DRA Ex. 192	Treasury Single Account Cash Flow weekly report dated June 18, 2021
DRA Ex. 193	Treasury Single Account Cash Flow weekly report dated June 25, 2021
DRA Ex. 194	Treasury Single Account Cash Flow weekly report dated June 30, 2021
DRA Ex. 195	Treasury Single Account Cash Flow weekly report dated July 9, 2021
DRA Ex. 196	Treasury Single Account Cash Flow weekly report dated July 16, 2021
DRA Ex. 197	Treasury Single Account Cash Flow weekly report dated July 23, 2021
DRA Ex. 198	Treasury Single Account Cash Flow weekly report dated July 30, 2021
DRA Ex. 199	Treasury Single Account Cash Flow weekly report dated August 6, 2021
DRA Ex. 200	Treasury Single Account Cash Flow weekly report dated August 13, 2021
DRA Ex. 201	Treasury Single Account Cash Flow weekly report dated August 20, 2021
DRA Ex. 202	Treasury Single Account Cash Flow weekly report dated August 27, 2021
DRA Ex. 203	Treasury Single Account Cash Flow weekly report dated September 3, 2021
DRA Ex. 204	Treasury Single Account Cash Flow weekly report dated September 10, 2021
DRA Ex. 205	Treasury Single Account Cash Flow weekly report dated September 17, 2021
DRA Ex. 206	Treasury Single Account Cash Flow weekly report dated September 24, 2021
DRA Ex. 207	HTA/CCDA Plan Support Agreement
DRA Ex. 208	“Jenniffer González anuncia que Medicaid ya cuenta con los \$2.9 billones para el próximo año fiscal,” Jenniffer González Colón press release
DRA Ex. 209	“Puerto Rico to Get \$2.9 Billion Next Fiscal Year for Medicaid,” <i>The Weekly Journal</i> , September 17, 2021
DRA Ex. 210	“The Curious Case of Puerto Rico’s Medicaid Funding,” <i>Washington Post</i> , September 28, 2021

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 211	Administrative Bulletin OE-2016-018 dated May 17, 2016
DRA Ex. 212	Administrative Bulletin EO-2016-030 dated June 30, 2016
DRA Ex. 213	Administrative Bulletin EO-2016-031 dated June 30, 2016
DRA Ex. 214	Commonwealth of Puerto Rico 2016 Operating Report
DRA Ex. 215	The Assignment and Security Agreement executed by and between HTA and GDB on August 28, 2013
DRA Ex. 216	First Amendment to Assignment and Security Agreement (March 31, 2015) between PR HTA and the GDB
DRA Ex. 217	Second Amendment to Assignment and Security Agreement (April 21, 2015) between PR HTA and the GDB
DRA Ex. 218	Third Amendment to Assignment and Security Agreement (June 16, 2015) between PR HTA and the GDB
DRA Ex. 219	Fourth Amendment to Assignment and Security Agreement (July 30, 2015) between PR HTA and the GDB
DRA Ex. 220	Fifth Amendment to Assignment and Security Agreement (November 10, 2015) between PR HTA and the GDB
DRA Ex. 221	Sixth Amendment to Assignment and Security Agreement (January 19, 2016) between PR HTA and the GDB
DRA Ex. 222	Financing Statement – UCC filing of Aug. 29, 2013
DRA Ex. 223	Financing Statement Amendment of March 2015
DRA Ex. 224	GDB Proof of claim (transferred to the DRA) No. 29485 [Dkt. Nos. 4970 and 5628]
DRA Ex. 225	GDB Debt Recovery Authority Bonds (Taxable) \$2,597,754,625 Aggregate Principal Amount of 7.500% Bonds Due 2040
DRA Ex. 226	Offering Memorandum for GDB Debt Recovery Authority Bonds, dated as of November 7, 2018
DRA Ex. 227	Master Transfer Agreement between the GDB and DRA dated November 29, 2018
DRA Ex. 228	AAFAF's Response and Objections to the DRA Parties' First Request For Production of Documents, dated August 13, 2021
DRA Ex. 229	Fiscal Plan For Puerto Rico, dated March 13, 2017
DRA Ex. 230	New Fiscal Plan For Puerto Rico, dated May 30, 2018
DRA Ex. 231	New Fiscal Plan for Puerto Rico dated April 19, 2018
DRA Ex. 232	New Fiscal Plan for Puerto Rico dated June 29, 2018
DRA Ex. 233	New Fiscal Plan for Puerto Rico dated October 23, 2018

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 234	Fiscal Plan For Puerto Rico, dated May 9, 2019
DRA Ex. 235	Fiscal Plan For Puerto Rico, dated May 27, 2020
DRA Ex. 236	Fiscal Plan For Puerto Rico, dated April 23, 2021
DRA Ex. 237	Puerto Rico Highways and Transportation Authority Certified Revised Fiscal Plan, dated June 29, 2018
DRA Ex. 238	Puerto Rico Highways and Transportation Authority Certified Revised Fiscal Plan, dated June 5, 2019
DRA Ex. 239	Puerto Rico Highways and Transportation Authority Certified Fiscal Plan, dated June 26, 2020
DRA Ex. 240	Puerto Rico Highways and Transportation Authority Certified Fiscal Plan, dated May 27, 2021
DRA Ex. 241	Commonwealth of Puerto Rico Basic Financial Statement and Required Supplementary Information with Independent Auditors' Report Thereon, dated June 30, 2016
DRA Ex. 242	Commonwealth of Puerto Rico Basic Financial Statement and Required Supplementary Information with Independent Auditors' Report Thereon, dated June 30, 2017
DRA Ex. 243	Commonwealth of Puerto Rico Basic Financial Statement and Required Supplementary Information with Independent Auditors' Report Thereon, dated June 30, 2018
DRA Ex. 244	Commonwealth of Puerto Rico Financial Information and Operating Data Report December 18, 2016
DRA Ex. 245	Puerto Rico Highways and Transportation Authority Independent Auditors' Report and Required Supplementary Information and Supplementary Schedules and Audit of Federal Awards, Fiscal Year Ended June 30, 2016
DRA Ex. 246	Puerto Rico Highways and Transportation Authority Independent Auditors' Report and Required Supplementary Information and Supplementary Schedules and Audit of Federal Awards, Fiscal Year Ended June 30, 2017
DRA Ex. 247	Puerto Rico Highways and Transportation Authority Independent Auditors' Report and Required Supplementary Information and Supplementary Schedules and Audit of Federal Awards, Fiscal Year Ended June 30, 2018
DRA Ex. 248	Puerto Rico Highways and Transportation Authority Financial Statements with Independent Auditors' Report and Required Supplementary Information and Supplementary Information, Fiscal Year Ended June 30, 2019
DRA Ex. 249	Letter from M. Dale to T. Mott, et al., dated September 10, 2021

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 250	2020 COFINA Fiscal Plan dated June 19, 2020
DRA Ex. 251	Certified Budget for the Commonwealth of Puerto Rico, Fiscal Year 2022, dated June 30, 2021
DRA Ex. 252	Debtors' Preliminary List of Witnesses to Be Offered in Support of Confirmation of Plan of Adjustment
DRA Ex. 253	Reporte R0334- Crudita AAFAF_CONF_0006284
DRA Ex. 254	PRIFAS Control Sheet dated May 27, 2020 AAFAF_CONF_0006285
DRA Ex. 255	HTA Vouchers received February 15 and September 14, 2017 AAFAF_CONF_0006291
DRA Ex. 256	PRIFAS Control Sheet dated April 15, 2020 AAFAF_CONF_0006297
DRA Ex. 257	PRIFAS Control Sheet dated April 29, 2020 AAFAF_CONF_0006300
DRA Ex. 258	Email Chain Re: HTA – Bank Account dated March 31, 2019 Ambac_Cash_2004_002 0022578
DRA Ex. 259	Oriental Bank Statement for HTA dated December 31, 2019 Ambac_Cash_2004_002 0022582
DRA Ex. 260	Oriental Bank Statement for HTA dated June 30, 2019 Ambac_Cash_2004_002 0022585
DRA Ex. 261	Oriental Bank Statement for HTA dated September 30, 2019 Ambac_Cash_2004_002 0022589
DRA Ex. 262	Email Chain Re: HTA – Bank Account dated October 10, 2019 Ambac_Cash_2004_002 0019984
DRA Ex. 263	Entidades Oficiales ELA - Custodia Hacienda Part 2 Ambac_Cash_2004_002 0023051
DRA Ex. 264	Oriental Bank Statement for HTA dated June 30, 2020 Ambac_Cash_2004_002 0031934
DRA Ex. 265	Puerto Rico Department of Treasury TSA March and Third Quarter FY 2018 Cash Flow CW_STAY0000203
DRA Ex. 266	Administrative Bulletin OE-2015-046 CW_STAY0000954
DRA Ex. 267	PRIFAS Codes Index CW_STAY0010548
DRA Ex. 268	Undated Letter from OMB responding to Appendix B Request 4 from the Board attaching charts of Revenue Accounts, Expense Accounts, and Accounts Held at Nongovernmental Banks CW_STAY0034228

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 269	Fund 278 PRIFAS Export CW_STAY0048545
DRA Ex. 270	Fund 278 Account Mapping CW_STAY0049729
DRA Ex. 271	Funds 793 and 278 Voucher Tabulation CW_STAY0049730
DRA Ex. 272	Diesel Revenues Fiscal Year 2015-2016 HTA_BDO-CTRL00000023
DRA Ex. 273	Gasoline Revenues Fiscal Year 2015-2016 HTA_BDO-CTRL00000033
DRA Ex. 274	Audit Workpaper re Treasury Letter to BDO dated Aug. 6, 2018 HTA-BDO-CTRL00000013
DRA Ex. 275	Audit Workpaper re Treasury Letter to BDO dated December 12, 2018 HTA-BDO-CTRL00000017
DRA Ex. 276	Email re: "FW: Item no. 11 - Analysis of the subsequent collections from the Department of the Treasury corresponding to FY 18 and the related PCA to record the bad debt reserba at 6/30/18." dated October 31, 2018 HTA-BDO-CTRL00000042
DRA Ex. 277	Email re: "Certificacion de Hacienda" dated July 20, 2017 HTA-BDO-CTRL00000044
DRA Ex. 278	278 Fund Accreditation FY 2014-2015 HTA_STAY0000207
DRA Ex. 279	278 Fund Accreditation November 2015 – December 2019 HTA_STAY0008372
DRA Ex. 280	278 Fund Accreditation November 2015-November 2020 HTA_STAY0054675
DRA Ex. 281	Email re: "02-06-2018 Detailed Excise Taxes and License Fees Revenues 2016 - 2017 (Auditoria FY16-17)" dated February 6, 2018. HTA-BDO-CTRL00000091
DRA Ex. 282	HTA Gasoline Excise Tax Revenues FY 2015-2016 HTA_STAY0000223
DRA Ex. 283	HTA Vouchers dated March 24-May 18, 2015 HTA_STAY0000454
DRA Ex. 284	Treasury Transfer Authorizations April-December 2015 HTA_STAY0000614
DRA Ex. 285	HTA Vouchers and Treasury Authorizations June 2015-February 2016 HTA_STAY0000628
DRA Ex. 286	HTA Audited Financial Statements for Year Ended June 30, 2015 HTA_STAY0000654
DRA Ex. 287	Treasury Authorizations January-December 2015 HTA_STAY0007985

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 288	BNY Mellon Account -8281 Statement June 2015 HTA_STAY0008494
DRA Ex. 289	BNY Mellon Account -8282 Statement June 2015 HTA_STAY0008496
DRA Ex. 290	BNY Mellon Account -0267 Statement July 2015 HTA_STAY0008764
DRA Ex. 291	BNY Mellon Account -0461 Statement August 2015 HTA_STAY0008953
DRA Ex. 292	BNY Mellon Account -5474 Statement October 2015 HTA_STAY0009259
DRA Ex. 293	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Feb. 2016 HTA_STAY0011917
DRA Ex. 294	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Jul. 2015 HTA_STAY0011921
DRA Ex. 295	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Jun. 2016 HTA_STAY0011931
DRA Ex. 296	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Dec. 2015 HTA_STAY0011945
DRA Ex. 297	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Jan. 2015 HTA_STAY0011959
DRA Ex. 298	Bank Reconciliation by the HTA Accounting Office for September 2016 HTA_STAY0012043
DRA Ex. 299	Oriental Bank Statement for HTA dated Jan. 31, 2015 HTA_STAY0012679
DRA Ex. 300	Oriental Bank Statement for HTA dated Feb. 28, 2015 HTA_STAY0012691
DRA Ex. 301	Oriental Bank Statement for HTA dated Mar. 31, 2015 HTA_STAY0012701
DRA Ex. 302	Oriental Bank Statement for HTA dated Apr. 30, 2015 HTA_STAY0012716
DRA Ex. 303	Oriental Bank Statement for HTA dated May. 31, 2015 HTA_STAY0012729
DRA Ex. 304	Oriental Bank Statement for HTA dated Jun. 30, 2015 HTA_STAY0012742
DRA Ex. 305	Oriental Bank Statement for HTA dated Jul. 31, 2015 HTA_STAY0012756
DRA Ex. 306	Oriental Bank Statement for HTA dated Aug. 31, 2015 HTA_STAY0012776
DRA Ex. 307	Oriental Bank Statement for HTA dated Sept. 30, 2015 HTA_STAY0012793

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 308	Oriental Bank Statement for HTA dated Oct. 31, 2015 HTA_STAY0012803
DRA Ex. 309	Oriental Bank Statement for HTA dated Nov. 30, 2015 HTA_STAY0012806
DRA Ex. 310	Economic Factors and Fiscal Year 2017 Budget, dated Dec. 22, 2017 HTA_STAY0028739
DRA Ex. 311	BNY Mellon Account -8281 Statement Feb. 2015 HTA_STAY0031520
DRA Ex. 312	BNY Mellon Account -8281 Statement Mar. 2014-Feb. 2015 HTA_STAY0031601
DRA Ex. 313	BNY Mellon Account -8282 Statement Mar. 2014-Feb. 2015 HTA_STAY0031681
DRA Ex. 314	BNY Mellon Account -8281 Account Overview and Statement Feb. 2015 HTA_STAY0031686
DRA Ex. 315	BNY Mellon Account -8282 Statement Mar. 2015 HTA_STAY0031764
DRA Ex. 316	BNY Mellon Account -8281 Statement Mar. 2015 HTA_STAY0031768
DRA Ex. 317	BNY Mellon Account -8282 Statement Apr. 2015 HTA_STAY0031848
DRA Ex. 318	BNY Mellon Account -8281 Statement Apr. 2015 HTA_STAY0031850
DRA Ex. 319	BNY Mellon Account -8282 Statement May 2015 HTA_STAY0031933
DRA Ex. 320	BNY Mellon Account -8281 Statement May 2015 HTA_STAY0031935
DRA Ex. 321	BNY Mellon Account -8282 Statement Sept. 2015 HTA_STAY0032338
DRA Ex. 322	BNY Mellon Account -8281 Statement Sept. 2015 HTA_STAY0032340
DRA Ex. 323	BNY Mellon Account -8282 Statement Nov. 2015 HTA_STAY0032485
DRA Ex. 324	BNY Mellon Account -8281 Statement Nov. 2015 HTA_STAY0032487
DRA Ex. 325	Oriental Bank Statement for HTA dated Jan. 31, 2019 HTA_STAY0046981
DRA Ex. 326	Oriental Bank Statement for HTA dated Jan. 31, 2020 HTA_STAY0046984
DRA Ex. 327	Oriental Bank Statement for HTA dated Feb. 28, 2019 HTA_STAY0046996
DRA Ex. 328	Oriental Bank Statement for HTA dated Apr. 30, 2019 HTA_STAY0047026

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 329	Oriental Bank Statement for HTA dated May 31, 2019 HTA_STAY0047039
DRA Ex. 330	Oriental Bank Statement for HTA dated Jul. 31, 2019 HTA_STAY0047066
DRA Ex. 331	Oriental Bank Statement for HTA dated Aug. 31, 2019 HTA_STAY0047076
DRA Ex. 332	Oriental Bank Statement for HTA dated Oct. 31, 2019 HTA_STAY0047102
DRA Ex. 333	Oriental Bank Statement for HTA dated Nov. 30, 2019 HTA_STAY0047115
DRA Ex. 334	Oriental Bank Statement for HTA dated Apr. 30, 2030 HTA_STAY0049927
DRA Ex. 335	Oriental Bank Statement for HTA dated Feb. 29, 2020 HTA_STAY0049936
DRA Ex. 336	Oriental Bank Statement for HTA dated Jul. 31, 2020 HTA_STAY0049948
DRA Ex. 337	Oriental Bank Statement for HTA dated Mar. 31, 2020 HTA_STAY0049956
DRA Ex. 338	Oriental Bank Statement for HTA dated May. 31, 2020 HTA_STAY0049959
DRA Ex. 339	Oriental Bank Statement for HTA dated Oct. 31, 2020 HTA_STAY0049966
DRA Ex. 340	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Jul. 2014 HTA_STAY0050791
DRA Ex. 341	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Aug. 2014 HTA_STAY0050793
DRA Ex. 342	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Sept. 2014 HTA_STAY0050795
DRA Ex. 343	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Oct. 2014 HTA_STAY0050797
DRA Ex. 344	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Nov. 2014 HTA_STAY0050799
DRA Ex. 345	“Fondos Act Referentes Leyes 30-31” Account -4276 Statement Dec. 2014 HTA_STAY0050801
DRA Ex. 346	Commonwealth Central Accounting Package re HTA for FY2015 HTA_STAY0050803
DRA Ex. 347	PRIFAS Control Sheet dated Jun. 22, 2015 HTA_STAY0050882

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 348	HTA Official Receipt 167277 dated Jul. 21, 2017 HTA_STAY0051048
DRA Ex. 349	HTA Official Receipt 171850 dated Jun. 26, 2018 HTA_STAY0051703
DRA Ex. 350	HTA Official Receipt 19032A dated Jun. 24, 2019 HTA_STAY0052026
DRA Ex. 351	HTA Vouchers September 2014 – January 2015 HTA_STAY0052948
DRA Ex. 352	HTA Vouchers July 2018 – October 2020 HTA_STAY0052226
DRA Ex. 353	HTA Vouchers July 2018 – October 2020 HTA_STAY0052313
DRA Ex. 354	Treasury Electronic Transfer Voucher 00206448 HTA_STAY0052392
DRA Ex. 355	Bank Reconciliation by the HTA Accounting Office for October 2016 HTA_STAY0054204
DRA Ex. 356	Bank Reconciliation by the HTA Accounting Office for November 2016 HTA_STAY0054166
DRA Ex. 357	Bank Reconciliation by the HTA Accounting Office for December 2016 HTA_STAY0054088
DRA Ex. 358	Bank Reconciliation by the HTA Accounting Office for January 2017 HTA_STAY0052557
DRA Ex. 359	Bank Reconciliation by the HTA Accounting Office for February 2017 HTA_STAY0052568
DRA Ex. 360	Bank Reconciliation by the HTA Accounting Office for March 2017 HTA_STAY0052618
DRA Ex. 361	Bank Reconciliation by the HTA Accounting Office for April 2017 HTA_STAY0052524
DRA Ex. 362	Bank Reconciliation by the HTA Accounting Office for May 2017 HTA_STAY0052743
DRA Ex. 363	Bank Reconciliation by the HTA Accounting Office for June 2017 HTA_STAY0052610
DRA Ex. 364	Bank Reconciliation by the HTA Accounting Office for July 2017 HTA_STAY0054521
DRA Ex. 365	Bank Reconciliation by the HTA Accounting Office for August 2017 HTA_STAY0054487
DRA Ex. 366	Bank Reconciliation by the HTA Accounting Office for September 2017 HTA_STAY0054557
DRA Ex. 367	Bank Reconciliation by the HTA Accounting Office for October 2017 HTA_STAY0054550
DRA Ex. 368	Bank Reconciliation by the HTA Accounting Office for December 2017 HTA_STAY0054497

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 369	Bank Reconciliation by the HTA Accounting Office for January 2018 HTA_STAY0054514
DRA Ex. 370	Bank Reconciliation by the HTA Accounting Office for February 2018 HTA_STAY0054504
DRA Ex. 371	Bank Reconciliation by the HTA Accounting Office for March 2018 HTA_STAY0054132
DRA Ex. 372	Bank Reconciliation by the HTA Accounting Office for April 2018 HTA_STAY0054056
DRA Ex. 373	Bank Reconciliation by the HTA Accounting Office for May 2018 HTA_STAY0054149
DRA Ex. 374	Bank Reconciliation by the HTA Accounting Office for June 2018 HTA_STAY0054530
DRA Ex. 375	Bank Reconciliation by the HTA Accounting Office for July 2018 HTA_STAY0054120
DRA Ex. 376	Bank Reconciliation by the HTA Accounting Office for August 2018 HTA_STAY0054074
DRA Ex. 377	Bank Reconciliation by the HTA Accounting Office for September 2018 HTA_STAY0054230
DRA Ex. 378	Bank Reconciliation by the HTA Accounting Office for October 2018 HTA_STAY0054213
DRA Ex. 379	Bank Reconciliation by the HTA Accounting Office for November 2018 HTA_STAY0054188
DRA Ex. 380	Bank Reconciliation by the HTA Accounting Office for December 2018 HTA_STAY0054101
DRA Ex. 381	Oriental Bank Statement for HTA dated November 30, 2017 HTA_STAY0052786
DRA Ex. 382	Treasury Authorization dated August 7, 2015 HTA_STAY0055723
DRA Ex. 383	Treasury Authorizations dated September 30, 2014 HTA_STAY0056001
DRA Ex. 384	Treasury Authorization dated February 25, 2015 HTA_STAY0056790
DRA Ex. 385	Treasury Authorization dated December 18, 2014 HTA_STAY0056791
DRA Ex. 386	Treasury Authorization dated November 25, 2014 HTA_STAY0056792
DRA Ex. 387	Treasury Authorization dated October 22, 2014 HTA_STAY0056793
DRA Ex. 388	Treasury Authorization dated September 22, 2014 HTA_STAY0056794
DRA Ex. 389	Treasury Authorization dated August 21, 2014 HTA_STAY0056795

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 390	Treasury Authorization dated July 22, 2014 HTA_STAY0056796
DRA Ex. 391	Treasury Authorization dated March 17, 2015 HTA_STAY0056808
DRA Ex. 392	Treasury Authorization dated February 26, 2015 HTA_STAY0056809
DRA Ex. 393	Treasury Authorization dated December 18, 2014 HTA_STAY0056810
DRA Ex. 394	Treasury Authorization dated November 26, 2014 HTA_STAY0056811
DRA Ex. 395	Treasury Authorization dated November 25, 2014 HTA_STAY0056812
DRA Ex. 396	Treasury Authorization dated September 19, 2014 HTA_STAY0056813
DRA Ex. 397	Treasury Authorization dated August 22, 2014 HTA_STAY0056815
DRA Ex. 398	Treasury Authorization dated July 29, 2014 HTA_STAY0056816
DRA Ex. 399	Treasury Authorization dated February 23, 2015 HTA_STAY0056827
DRA Ex. 400	Treasury Authorization dated January 30, 2015 HTA_STAY0056828
DRA Ex. 401	Treasury Authorization dated January 20, 2015 HTA_STAY0056829
DRA Ex. 402	Treasury Authorization dated December 19, 2014 HTA_STAY0056830
DRA Ex. 403	Treasury Authorization dated November 25, 2014 HTA_STAY0056831
DRA Ex. 404	Treasury Authorization dated October 31, 2014 HTA_STAY0056832
DRA Ex. 405	Treasury Authorization dated October 30, 2014 HTA_STAY0056833
DRA Ex. 406	Treasury Authorization dated October 22, 2014 HTA_STAY0056834
DRA Ex. 407	Treasury Authorization dated September 26, 2014 HTA_STAY0056837
DRA Ex. 408	Treasury Authorization dated August 26, 2014 HTA_STAY0056838
DRA Ex. 409	Treasury Authorization dated July 29, 2014 HTA_STAY0056839
DRA Ex. 410	Treasury Authorization dated July 18, 2014 HTA_STAY0056840

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 411	Oriental Bank Account -9874 Statement dated July 31, 2016 Oriental 000001-001768
DRA Ex. 412	Fiscal Plan – Financial Model 2021 Certified Fiscal Plan FOMB_CONF_88824
DRA Ex. 413	Best interests test (BIT) model for the CW, ERS, and PBA published on June 10, 2021 FOMB_CONF_88825
DRA Ex. 414	Chart of Plan of Adjustment and Plan Support Agreement Go SUT CVI Waterfall MURRAY_CONF_00089
DRA Ex. 415	Proof of Claim No. 174309 filed on July 28, 2020
DRA Ex. 416	Proof of Claim No. 151149 filed on June 29, 2018
DRA Ex. 417	Administrative Bulletin OE-2015-049
DRA Ex. 418	Department of Treasury Circular Letter No. 1300-15-16 dated December 17, 2015
DRA Ex. 419	1996 CCDA Loans
DRA Ex. 420	AAFAF'S Responses And Objections To The Dra Parties' First Request For Production Of Documents
DRA Ex. 421	Letter from AAFAF to DRA Parties re: DRA Parties' Discovery to AAFAF in Connection with Plan Confirmation dated September 8, 2021
DRA Ex. 422	HTA Audited Financial Statements Years Ending June 30, 2014 and 2013
DRA Ex. 423	HTA Audited Financial Statements Year Ending June 30, 2016 HTA_STAY0000769
DRA Ex. 424	HTA Audited Financial Statements Year Ending June 30, 2017 HTA_STAY0000834
DRA Ex. 425	HTA Audited Financial Statements Year Ending June 30, 2018 HTA_STAY0000941
DRA Ex. 426	HTA Audited Financial Statements Year Ending June 30, 2019
DRA Ex. 427	Responses And Objections Of The Financial Oversight And Management Board For Puerto Rico To The DRA Parties' First Set Of Interrogatories To The Financial Oversight And Management Board For Puerto Rico
DRA Ex. 428	Exhibit A to the Financial Oversight And Management Board For Puerto Rico To The Dra Parties' First Set Of Interrogatories To The Financial Oversight And Management Board For Puerto Rico
DRA Ex. 429	Commonwealth Fiscal Plan for 2018
DRA Ex. 430	Fiscal Plan for HTA FY 2022-FY 2051 dated as of May 26, 2021

Exhibit Identifier	Description of Exhibit ⁶
DRA Ex. 431	Puerto Rico House Bill 1003 (as translated into English) approved by the Puerto Rico House on September 30, 2021
DRA Ex. 432	Puerto Rico HB 1003, as amended on October 20, 2021
DRA Ex. 433	Letter of September 15, 2021 from the FOMB to the Government of Puerto Rico
DRA Ex. 434	Letter of September 24, 2021 from the FOMB to the Government of Puerto Rico
DRA Ex. 435	Letter from the Financial Oversight and Management Board for Puerto Rico to Governor Pedro Pierluisi, Senate President Jose L. Dalmau, and House Speaker Rafael Hernandez, dated October 14, 2021
DRA Ex. 436	FOMB Statement of October 21, 2021
DRA Ex. 437	Natalie Jaresko's Profile from the FOMB's website
DRA Ex. 438	Linkedin Profile of Adam Chepenik
DRA Ex. 439	Curriculum Vitae of Fernando Batlle

In addition to the objections and reservations elsewhere herein, the DRA Parties reserve the right to supplement the exhibit list after consideration of the witness and exhibit lists filed by the other parties in this proceeding. Moreover, the DRA Parties reserve the right to use some, and not necessarily all, of the documents included in this exhibit list.

Deposition Designations

The DRA Parties hereby designate the following deposition testimony of Natalie Jaresko, Fernando Batlle, and Adam Chepenik, subject to the objections and reservations herein:

A. Natalie Jaresko

Pages	Lines
24	20-25
25	1-7
28	18-25
29	1-25
30	1-25
31	1
33	15-23

Pages	Lines
44	19-25
45	1-7
51	17-25
52	1-16
56	12-25
57	1-7
60	5-14
61	4-14
61	15-25
62	1-17
63	13-25
64	1-25
65	1-12
66	16-25
67	1-25
69	4-11
85	21-25
86	1-6
87	5-14
94	3-11
99	2-8
99	13-17
102	12-25
103	1-16
112	24-25
113	1-11
118	2-21
121	11-20
125	8-25
126	1-3
129	7-21
130	1-25
131	1-19
132	24-25
133	1-25
134	1-5
141	7-21
145	5-15
150	2-25

Pages	Lines
151	1
151	10-25
152	1-7
154	14-25
155	1-19

B. Fernando Batlle

Pages	Lines
38	18-25
39	1-7
45	14-25
46	1-5
47	19-21
48	22-25
49	1-25
50	1-5
92	21-24
93	1-4
50	22-25
51	1-18
53	3-8
54	11-25
55	1-9
55	10-13
55	18-24
59	2-11
60	25
61	1-5
65	12-21
66	23-25
67	3-7
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114	11-20
61	24-25
62	1-24
64	20-25
92	1-5
65	1-11

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107	1-25
108	1-15
116	13-24
120	12-25
121	1-13
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140	22-25
141	1-25
142	1
144	2-25
145	1
143	10-25
144	1
191	6-25
192	1-24
194	19-24

C. Adam Chepenik

Pages	Lines
7-10	1-25
11	1-6
33	17-25
34	1-21
42	20-25
43	1-21
44	22-25
45	3-23

Pages	Lines
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59	18-20
59	22-25
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143	20-25

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175	23-25
176	1-25
177	1-25
178	1-15
181	3-18
189	11-15
195	18-23
227	18-25
228	1-10

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 22nd day of October, 2021

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MCCONNELL VALDÉS LLC

270 Muñoz Rivera Avenue, Suite 7
Hato Rey, Puerto Rico 00918
P.O. Box 364225
San Juan, PR 00936-4225
Tel: 787-250-5632
Fax: 787-759-9225

By: /s/ Arturo J. García-Solá
Arturo J. García-Solá
(USDC No. 201903)
E-mail: ajg@mcvpr.com

/s/ Alejandro J. Cepeda-Díaz
Alejandro J. Cepeda-Díaz
(USDC No. 222110)
E-mail: ajc@mcvpr.com

/s/ Nayuan Zouairabani
Nayuan Zouairabani
(USDC No. 226411)
E-mail: nzt@mcvpr.com

Attorneys for AmeriNational Community Services, LLC, as Servicer for the GDB Debt Recovery Authority

C. CONDE & ASSOC. LAW OFFICES

By: /s/ Carmen D. Conde Torres
Carmen D. Conde Torres
(USDC No. 207312)

/s/ Luisa S. Valle Castro
Luisa S. Valle Castro
(USDC No. 215611)

254 San José Street
Suite 5
San Juan, PR 00901-1523
Tel: 787-729-2900
Fax: 787-729-2203
E-mail: condecarmen@condelaw.com

-and-

SCHULTE ROTH & ZABEL LLP

By: /s/ Douglas S. Mintz
Douglas S. Mintz (admitted *pro hac vice*)
Noah N. Gillespie (admitted *pro hac vice*)
901 Fifteenth Street, NW, Suite 800
Washington, DC 20005
Tel: 202-729-7470
Fax: 202-730-4520
E-mail: douglas.mintz@srz.com
noah.gillespie@srz.com

-and-

Douglas Koff (admitted *pro hac vice*)
Taleah Jennings (admitted *pro hac vice*)
Abbey Walsh (admitted *pro hac vice*)
Peter J. Amend (admitted *pro hac vice*)
919 Third Avenue
New York, NY 10022
Tel: 212-756-2000
Fax: 212-593-5955

E-mail: douglas.koff@srz.com
taleah.jennings@srz.com
abbey.walsh@srz.com
peter.amend@srz.com

Attorneys for Cantor-Katz Collateral Monitor LLC, as Collateral Monitor for the GDB Debt Recovery Authority